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Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	: (Jointly Administered)
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NOTICE OF APPEAL

PLEASE TAKE NOTICE that General Motors LLC (“**New GM**”) hereby appeals under 28 U.S.C. § 158(a)(1) and Rules 8001 and 8002 of the Federal Rules of Bankruptcy Procedure to the United States District Court for the Southern District of New York from: (i) the *Order Regarding Benjamin Pillars’ No Stay Pleading and Related Pleadings*, entered by the United States Bankruptcy Court for the Southern District of New York (“**Bankruptcy Court**”) in the above-referenced case on July 29, 2015 (the “**Initial Order**”) [Dkt. No. 13328]; and (ii) the *Decision and Order on Motion to Reconsider and Amend*, entered by the Bankruptcy Court on September 9, 2015 (the “**Decision**”) [Dkt. No. 13427]. Copies of the Initial Order and the

Decision are annexed hereto as Exhibits "A" and "B" respectively.

The names of all parties to the Decision and Initial Order appealed from and the names, addresses, and telephone numbers of their respective counsel are as follows:

<p>KING & SPALDING LLP 1185 Avenue of the Americas New York, New York 10036 Telephone: (212) 556-2100 Facsimile: (212) 556-2222 By: Arthur J. Steinberg, Esq. Scott I. Davidson, Esq.</p> <p>KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 By: Richard C. Godfrey, P.C. Andrew B. Bloomer, P.C.</p> <p><i>Counsel for General Motors LLC</i></p>	<p>THE MASTROMARCO FIRM 1024 N. Michigan Avenue Saginaw, Michigan 48602 By: Victor J. Mastromarco, Jr. Russell C. Babcock</p> <p><i>Counsel for Benjamin Pillars</i></p>
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Dated: New York, New York
September 22, 2015

Respectfully submitted,

/s/ Arthur Steinberg
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-and-

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